

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

JUAN LOPEZ, *on behalf of himself, FLSA Collective  
Plaintiffs and the Class,*

Plaintiff,

v.

THERMO TECH MECHANICAL, INC.,  
GOWKARRAN BUDHU, and SHANTI BUDHU,

Defendants.

Case No.: 20-cv-09113 (LTS)(BCM)

**PLEASE TAKE NOTICE** that upon the accompanying Memorandum of Law and annexed materials, Plaintiff, on behalf of himself, FLSA Collective Plaintiffs and the Class, by his undersigned attorneys, hereby moves the Court, pursuant to Rule 15 of the Federal Rules of Civil Procedure for leave to file a Second Amended Class and Collective Action Complaint, which has been attached as Exhibit 1 to the Affirmation of C.K. Lee.

**PLEASE TAKE FURTHER NOTICE** that pursuant to Rule 6.1 of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, any opposing declarations and answering memorandum of law in response to the motion herein must be served on or before February 14, 2023.

Dated: New York, New York  
January 31, 2023

Respectfully submitted,

LEE LITIGATION GROUP, PLLC

By: /s/ C. K. Lee

C. K. Lee, Esq.

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